

MICHAEL DEAN LOCKARD
19 E. Chatsworth Road
Reisterstown, MD 21136

Plaintiff

v.

STAR COACHES, INC.
SERVE ON: Lee B. Beithchman, Resident Agent
215 14TH Street NW
Atlanta, GA 30318

Defendant

: IN THE
:
: CIRCUIT COURT
:
: OF MARYLAND
:
: FOR
:
: BALTIMORE COUNTY
:
: Case No:

COMPLAINT AND REQUEST FOR JURY TRIAL

COMES NOW the Plaintiff Michael Dean Lockard, by his attorneys, David Ellin; and the Law Office of David Ellin, P.C., and sues the Defendant Star Coaches, Inc. and states as follows:

1. The Plaintiff is a resident of Baltimore County, Maryland.
2. The Defendant Star Coaches, Inc. (hereinafter known as the "Defendant Corporation") regularly conducts business in and around the State of Maryland, including Baltimore County.
3. The accident which is the subject of this lawsuit occurred in Baltimore County, Maryland.
4. Venue is claimed in Baltimore County, Maryland.
5. On or about May 13, 2018, Plaintiff Lockard was directing a tour bus which was at all times owned by the Defendant Corporation and was at all times operated by an employee; agent; servant; and/or representative of the Defendant Corporation.
6. Suddenly and without warning, as the operator of the tour bus was backing up, he failed to notice the presence of the Plaintiff, causing a collision with his unprotected body.

7. As a result of the collision, the Plaintiff suffered injuries which compelled him to seek medical treatment.

8. The Plaintiff has lost his former state of physical and mental well-being; incurred medical and other expenses; lost time from work and is unable to participate in many of the physical activities he previously enjoyed.

9. Plaintiff was in no way contributorily negligent.

10. It is alleged that the Defendant Corporation, by and through their employee; agent; servant; and/or representative was negligent in that he or she failed to control the vehicle; failed to recognize the presence of the Plaintiff; failed to avoid a collision; operated his or her vehicle in a reckless and negligent manner; and failed to observe the traffic laws of the state of Maryland, thus causing severe injury to the Plaintiff.

WHEREFORE this suit is brought and the Plaintiff Michael Dean Lockard claims damages against Defendant Star Coaches, Inc. in an amount exceeding SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00).



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Attorneys for the Plaintiff

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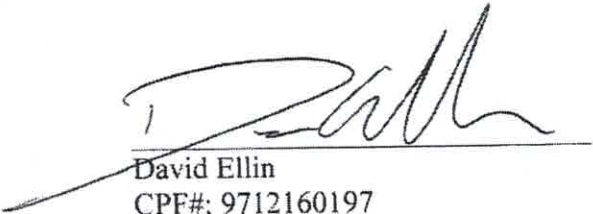
Defendant

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REQUEST FOR JURY TRIAL

Plaintiff hereby requests a jury trial in the above-captioned matter.



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Attorneys for the Plaintiff